

MELINDA HAAG (CABN 132612)
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division

KATHRYN HAUN (DCBN 484141)
WILLIAM FRENTZEN (LABN 24421)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
Kathryn.haun@usdoj.gov

Attorneys for United States

FILED

OCT 21 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. 13-CR-93 JST
)	
)	STIPULATION AND PROPOSED ORDER
)	REGARDING RULE 15 DEPOSITION OF G.M.
v.)	
)	
JONATHAN MOTA,)	
)	
Defendant.)	

The parties stipulate and agree as follows:

1. G.M. is a witness who the government anticipates will testify regarding the events of the January 18, 2013, alleged in the Indictment.

2. G.M. resides in Lake County in the Northern District of California. She is not able to travel to San Francisco to testify at the trial, scheduled to begin at the earliest on April 13, 2015, for medical reasons set forth more fully in the attached Declaration of Special Agent Megan Long.

3. The parties agree that a deposition of G.M. is appropriate pursuant to Fed. R. Crim. P. 15(a). The United States will make arrangements for G.M.'s deposition to be taken here in the federal building in San Francisco. The parties, in consultation with the U.S. Marshal's and the witness, have

1 agreed on October 29, 2014, following the hearing in the instant matter. Giglio/Brady/Jencks material
2 pertaining to this witness has already been provided to defense counsel.

3 4. The defendant and standby counsel may be present at the deposition and have the
4 opportunity to cross-examine the witness.

5 5. The parties agree that G.M.'s deposition testimony may be offered in evidence pursuant
6 to Rule 15 and that admissibility of particular answers will be subject to the Federal Rules of Evidence,
7 as provided by Rule 15(f). The parties further agree that all substantive objections will be preserved and
8 need not be asserted during the deposition; all objections as to form of question must be asserted during
9 the deposition or will be waived.

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11 DATED: October 8, 2014

Respectfully submitted,

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13 MELINDA HAAG
United States Attorney

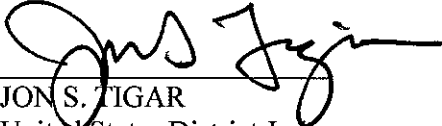
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15 /s/
KATHRYN HAUN
16 WILLIAM FRENTZEN
Assistant United States Attorneys

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18 /s/
RICHARD MAZER, Esq.
19 Standby Counsel for Pro Se Defendant
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ORDER

Pursuant to stipulation, IT IS SO ORDERED.

DATED: 10/21/14


JON S. TIGAR
United States District Judge